

ALEX G. TSE (CABN 152348)
Acting United States Attorney

BARBARA J. VALLIERE (DCBN 439353)
Chief, Criminal Division

RANDALL LEONARD (FLBN 0056205)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7018
Fax: (415) 436-7234
Email: Randall.Leonard@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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|---------------------------|---|-------------------------|
| UNITED STATES OF AMERICA, |) | NOS. CR 17-340 WHA |
| |) | |
| Plaintiff, |) | |
| |) | GOVERNMENT'S SENTENCING |
| v. |) | MEMORANDUM |
| |) | |
| ROOZBEH IRAVANI, |) | |
| |) | |
| Defendant. |) | |
| |) | |
| |) | |

In this matter, the parties carefully negotiated a plea agreement that, to them, proposed a necessary and just sentence. The parties guided themselves, as the Court must, by the purposes of sentencing as determined by Congress, 18 U.S.C. § 3553(a)(2), and they reached the following agreement on the sentence defendant Roozbeh Iravani should serve: 48 months' imprisonment, a five-year term of supervised release, a \$100 special assessment, and restitution as determined by the Court.

After conducting its presentence investigation, the Court's probation officer agrees with the parties and recommends this same sentence. The government now asks the Court to adopt it. As the Probation Officer correctly concluded, this sentence will promote respect for the law and deter the kind of conduct Iravani engaged in while simultaneously providing him with the opportunity to receive

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1 training and treatment so that, once released, he never again has to appear before the Court. *See* 18
2 U.S.C. § 3553(a)(2); PSR, Sentencing Recommendation, p. 2. (“The undersigned believes [that the
3 proposed sentence] is sufficient but not great than necessary to address the needs listed in 18 U.S.C. §
4 3553.”).

5 The parties’ plea agreement left unresolved the issue of restitution. Three victims in this case
6 seek restitution in various amounts. The parties agree, and have filed a separate stipulation to this effect,
7 *see* CM-ECF Doc. 31, that these victims should be awarded \$1,000 each for restitution, for a total
8 restitution award of \$3,000.

9 The government therefore asks the Court to impose the following sentence: 48 months’
10 imprisonment, followed by a five-year term of supervised release; a \$100 special assessment; and
11 \$3,000 in restitution, paid \$1,000 each to the three victims who requested restitution.

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13 Respectfully submitted,

14 ALEX G. TSE
15 Acting United States Attorney

16 Dated: July 11, 2018

17 /s/
18 RANDALL LEONARD
19 Assistant United States Attorney
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